

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

XOCKETS, INC.,

Plaintiff,

v.

**NVIDIA CORPORATION,
MICROSOFT CORPORATION, and
RPX CORPORATION**

Defendants.

Civil Action No. 6:24-cv-00453-LS

JURY TRIAL DEMANDED

**PLAINTIFF XOCKETS, INC.'S REPLY IN SUPPORT OF ITS
MOTION FOR ENTRY OF PROTECTIVE ORDER**

The Court should grant Xockets' Motion. Defendants' supposed newfound desire to negotiate a protective order is simply feigned cooperation in the face of this Motion. Xockets first proposed a protective order in November 2024, then corresponded and met and conferred with Defendants over seven months. Defendants dragged out the process of providing feedback on Xockets' drafts and substantively meeting and conferring on Xockets' proposals, frustrating the parties' ability to get a protective order timely entered in this long-pending case. As discussed in Xockets' Motion, Defendants' repeated delay tactics have caused the parties to miss numerous deadlines in the Federal Rules (and Local Rules). This case is now nine months old with no schedule and no adequate protective order, all due to the Defendants' delay tactics and refusal to meet the requirements of the Rules. Xockets already has conceded to as many changes as it could to arrive at the version of the protective order that is attached as Exhibit A to its Motion in the hopes of stemming Defendants' delay of this process. If Defendants were going to agree to Xockets' proposed protective order (Ex. A), they would have done so in their Opposition. Instead, Defendants opposed, so Xockets does not accept any implication in Defendants' Opposition that

Defendants might still change their minds. By definition, the parties are at an impasse, and further meeting and conferring will not resolve the parties' dispute. The Court should enter Xockets' proposed protective order.

Dated: July 1, 2025

Respectfully submitted,

/s/ Nadia E. Haghighatian

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ATTORNEYS FOR XOCKETS, INC.

CERTIFICATE OF SERVICE

I hereby certify that, on July 1, 2025, I electronically submitted the foregoing document with the clerk of the United States District Court for the Western District of Texas, using the electronic case management CM/ECF system of the Court which will send notification of such filing to all counsel of record who are deemed to have consented to electronic service.

/s/ Nadia E. Haghghatian

Nadia E. Haghghatian